

Exhibit 2

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
(Northern Division)**

CHELSEA GILLIAM, *et al.*,

*

Plaintiffs,

*

v.

Civil Action No. 1:23-cv-1047

*

DEPARTMENT OF PUBLIC SAFETY
AND CORRECTIONAL SERVICES, *et al.*,

*

Defendants.

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* * * * *

DECLARATION OF CHLOE GREY

I, Chloe Grey, am over the age of 18 years and competent to testify as to the matters set forth in this Declaration.

1. In early July 2024, I was given 7 pages of paper and asked to describe my feelings and opinions about my safety and security at a list of institutions. I wrote in great detail about why, how out of all the institutions, I am in most danger at NBCI.
2. NBCI culture is very unique compared to every other institution I've been in. It is vehemently anti-LGBTQ.
3. At this time, my understanding is that there are no transgender people being housed in general population at NBCI. There are two people with gender dysphoria cards in general population but my understanding is that they have de-transitioned for their safety and become Muslim.

4. The culture at NBCI is such that when an LGBTQ person is placed into a cell with anyone transgender or gay, the LGBTQ person will be stabbed if they do not “check in”—meaning request to be pulled out of the cell and placed in protective custody.
5. Correctional officers at NBCI have told me that they would “tighten me up” for all the complaints I’ve made, which means they will encourage inmates to assault me. I believe these threats because they regularly laugh when other inmates harass me or threaten to rape me.
6. On prior occasions, I have stated that I would be willing to go to general population at NBCI if they would place me in a single cell, assign me a cellmate that is LGBTQ or someone willing to go on the record stating they would be tolerant of a transwoman, or to place me on tiers three or four where inmates are known to be less violent.
7. I have submitted ARPs about the threats I’m receiving for rape and physical harm from both corrections officers and inmates but nothing happens.
8. In my July response regarding my safety, I indicated that if I could not be transferred to a women’s institution, I would feel most safe at Jessup Correctional Institution (“JCI”).
9. Although I have never been housed at JCI, I have visited there and have an understanding of the culture. I would be safer there because there are lower security and less violent inmates, the culture is less violent and more tolerant of LGBTQ people, and the officers are less likely to harass or retaliate against inmates.
10. Although I would still greatly fear for my safety being housed with men and remain incredibly fearful of having to change clothes or use the toilet in front of a male cellmate, I believe I could adjust to life at JCI.

11. Going into my eighth month in solitary confinement without any privileges, my mental health has deteriorated significantly. I am depressed and anxious and my gender dysphoria has worsened.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 5, 2024



Lauren DiMartino (for Chloe Grey)

Signed on _____
Chloe Grey